Exhibit "A"

IN THE UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF PENNSYLVANIA

STAMBAUGH'S AIR SERVICE, INC., :

Plaintiff

: CASE NO. 1:CV-00-0660

v.

SUSQUEHANNA AREA REGIONAL AIRPORT AUTHORITY, BAA

: Judge Yvette Kane

: Magistrate Judge J. Andrew Smyser

HARRISBURG, INC., DAVID FLEET, individually, DAVID HOLDSWORTH, individually, and DAVID C. McINTOSH,:

individually,

Defendants

PLAINTIFF STAMBAUGH'S AIR SERVICE, INC.'S FIRST SET OF REQUEST FOR PRODUCTION OF DOCUMENTS DIRECTED TO DEFENDANTS

Pursuant to Rule 33 of the Federal Rules of Civil Procedure, Plaintiff, Stambaugh's Air Service, Inc. ("Stambaugh's") requests that within thirty (30) days of service of these Request, Defendants Susquehanna Area Airport Authority ("SARAA"), BAA Harrisburg, Inc. ("BAA"), David Fleet ("Fleet"), David Holdsworth ("Holdsworth"), and David C. McIntosh ("McIntosh") answer the following Interrogatories fully and separately in writing, under oath.

DEFINITIONS

- 1. "Defendants" or "you" refers to Defendants SARAA, BAA, Fleet, Holdsworth, and McIntosh, and to each of their representatives, agents and attorneys.
- "Stambaugh's" or "Plaintiff" refers to the named plaintiff, its employees, agents 2. of any other person or entity authorized to act for or on behalf of Plaintiff.
 - "FBO" shall mean fixed base operator. 3.

- 4. "HIA" refers to Harrisburg International Airport.
- 5. "RFQ" refers to the October 5, 1999 Request for Qualifications issued by some or all of the defendants.
 - 6. "AERO" refers to AERO Services International Incorporated.
- 7. "AMP Hangar" refers to a hangar located at HIA and which was previously owned by the AMP Corporation and which has been purchased by SARAA.
- "Identify," when used in reference to a natural person, means to state his 8. or her name, present or last known address and telephone number, present or last known employer and his or her employer's address, and position or job title at time of employment.
- 9. "Identify" or "Identification" shall mean, when used in reference to any document, to:
- state the type of document (e.g., letter, memorandum, telegram, a. etc.);
 - state its date; b.
 - state its title, if any; C.
 - d. describe its general subject matter and contents;
- identify the present location(s) and custodian(s) of the original and ę. all known copies of said document;
 - f. identify its author or originator;
- if the document is no longer in your possession, identify its last g. known custodian, describe the circumstances under which it passed from your control to that

person, and identify each person having knowledge of such circumstances and/or each person having knowledge of such circumstances and/or the present location of the document; and/or

- h. in lieu of identifying the document in the manner set forth above, attach a copy of the document in question to your response to these interrogatories.
- "Document" as used herein shall mean and include without limitation, all 10. writings of any kind, including the original and all non-identical copies, whether different from the originals by reason of any notation made on such copies or otherwise (including, without limitation, correspondence, memoranda, notes, diaries, contracts, statistics, letters, telegrams, minutes, reports, studies, checks, statements, receipts, returns, summaries, pamphlets, books, interoffice and intra-office correspondence, electronic mail, offers, notations of any sort of conversations, meetings or other communications, bulletins, printed matter, computer printouts, teletype, telefax, invoices, purchase orders, worksheets, and all drafts, alterations, modifications. changes and amendments of any of the foregoing), graphic or oral records or representations of any kind (including without limitation, photographs, charts, graphs, microfiche, microfilm, videotape recordings, motion pictures), any electronic, mechanical, or electrical records or representations of any kind (including without limitation, tapes, cassettes, disks, and recordings). The term "document" means each document which is or was in the possession, custody or control of plaintiff or his agents or representatives, including counsel, and each document known by plaintiff to have existed or which presently exists.

REQUEST

Complete copies of all audited financials for the years 2000; 2001; 2002; 2003; 1 2004 and 2005, including, but not limited, reports, graphs, charts and all related documents.

ANSWER:

Respectfully submitted,

By:

Krean D. Eunningham, Esquire

I.D. No. 23144

2320 North Second Street

Harrisburg, PA 17110

(717) 238-6570 Telephone:

Attorneys for Plaintiff

Exhibit "B"

IN THE UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF PENNSYLVANIA

STAMBAUGH'S AIR SERVICE, INC., :

:

Plaintiff

: CASE NO. 1:CV-00-0660

SUSQUEHANNA AREA REGIONAL

: Judge Yvette Kane

AIRPORT AUTHORITY, BAA

٧.

: Magistrate Judge J. Andrew Smyser

HARRISBURG, INC., DAVID FLEET, individually, DAVID HOLDSWORTH, individually, and DAVID C. McINTOSH,:

individually,

Defendants

PLAINTIFF STAMBAUGH'S AIR SERVICE, INC.'S SECOND SET OF REQUEST FOR PRODUCTION OF DOCUMENTS DIRECTED TO DEFENDANTS

Pursuant to Rule 33 of the Federal Rules of Civil Procedure, Plaintiff, Stambaugh's Air Service, Inc. ("Stambaugh's") requests that within thirty (30) days of service of these Request, Defendants Susquehanna Area Airport Authority ("SARAA"), BAA Harrisburg, Inc. ("BAA"), David Fleet ("Fleet"), David Holdsworth ("Holdsworth"), and David C. McIntosh ("McIntosh") answer the following Interrogatories fully and separately in writing, under oath.

DEFINITIONS

- 1. "Defendants" or "you" refers to Defendants SARAA, BAA, Fleet, Holdsworth, and McIntosh, and to each of their representatives, agents and attorneys.
- 2. "Stambaugh's" or "Plaintiff" refers to the named plaintiff, its employees, agents of any other person or entity authorized to act for or on behalf of Plaintiff.
 - 3. "FBO" shall mean fixed base operator.

REQUEST

Complete copies of all Fuel Flowage Reports for both Commercial and General 1. Aviation submitted to the F.A.A. by Defendants from January 1, 1999 through present, including, but not limited, reports, graphs, charts and all related documents.

ANSWER:

Respectfully submitted,

CUNNINGHAM & CHERNICOFF, P.C.

Dated: June 14, 2007 /s/ Jordan D. Cunningham, Esquire By:

Jordan D. Cunningham, Esquire

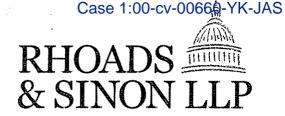
PA I.D. No. 23144

2320 North Second Street Harrisburg, PA 17110

Telephone: (717) 238-6570

Attorneys for Plaintiff

Exhibit "C"



Dean F. Piermattei

ph (717) 233-5731

fx (717) 231-6637

dpiermattei@rhoads-sinon.com

FILE NO: 6216.5

June 25, 2007

Re: Stambaugh v. SARAA

Jordan Cunningham, Esquire Cunningham & Chemicoff, P.C. 2320 N. 2nd Street Harrisburg, PA 17110 VIA: Hand Delivery

Dear Jordan:

While I understand you are on vacation, you directed me to deal with your associate who will be attending the deposition. I am providing to you, via hand delivery, to your associate, this date, additional documents, some of which you may already have in your possession. This should be considered a formal supplement to our discovery responses. Enclosed are the following:

- 1. Documents Bates numbered SARAA07168-07287 (will be used as deposition exhibit);
- 2. A disc containing information relating to building repairs from 1998 2007;
- 3. Areo Contract with SARAA (will be used as deposition exhibit). I believe this is already contained in your client's records, however, I am providing it again for the sake of completeness);
- 4. requested fuel flowage records for HIA from January 2000 through 2006;

Additionally, you also requested whether any of the Authority's witnesses would be available on Saturday, June 30, 2007. I will be out of town for the holiday weekend, but Heather Kelly from my office is available to defend these depositions. Belinda Svirbely is available, and I am waiting to hear back from Fred Testa. We do not intend to call Tom Peiffer as a witness.

There remain outstanding problems with the documents produced by your client. First, Plaintiff has only produced consolidated financial information for a three year period. However, they have alleged continuing damages. Accordingly, we need <u>all</u> consolidated financials through the present. Moreover, we are still awaiting documentation supporting many of the categories of damages that have been pled in the Second Amended Complaint. You indicated that Mark Stambaugh will be producing additional documents during his deposition today. We will review those, and, to the extent that any deficiencies remain, will seek a conference with Magistrate Smyser.

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June 25, 2007 Page 2

Thank you for your prompt attention to the above matters.

Very truly yours,

RHOADS & SINON LLP

By: Dean & Riermatter/ Dean F. Piermattei

Enclosures

Exhibit "D"

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1002/22/3

HARRISBURG INTERNATIONAL ARPORT

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Air Georgian	12,954	10,147	13,627	9,383	9,484	127.8	9,321	9,713	8,882	150,8	13,767	11,702	127,553 C
Attanta Coast - United Express	14,848	48,822	90,505	76,442	84,911	85,632	90,352	85,138	81,590	85,528	90,780	80,411	922,039
American Eagle	78,557	65,251	67,028	72,662	82,448	74,502	78,113	81,924	77,233	90,830	92, 154	56,383	959,093
Allantic Southeast	21,105	17,211	22.138	15,959	16,281	٥	0	0	o	o	c	0	82,672
Conair Arfines	555,88	99,423	100,425	78,902	97,741	109,160	104,718	125,802	94,938	118,149	128,258	140,891	1,289,740
Constacts	7,439	6,345	4,904	1,951	5,667	3,885	4,258	2,885	3,475	2,534	296	1,349	48,693
Continental Atfanes	27,062	20.935	22,363	21,691	27,579	21,247	18,524	18,024	17,518	24,579	25,221	27,573	268, 1885
North West Afrines	70,177	71,128	71,298	75,104	87,046	90,434	102,625	101,781	500,98	105,930	105,559	103,442	1,083,849
United Airtines	135,181	90,557	94,379	80.155	95,077	85,502	94,324	84,857	78,581	88,197	93,638	89,634	1.101.392
US Atways	20,572	34,537	28,787	18,442	18,985	35,423	48,514	48,353	28,285	40,124	40,050	35,404	394,508
USA's Express	70,692	51,015	90,187	99,362	102,578	94,024	95,748	94,308	101,728	110,647	82,025	581,182	1,039,032
PASSENGER TOTAL	548,929	523,372	603,538	553,033	613,075	609,560	646,495	649,613	589,272	677,135	582,434	684,271	7,386,027
SIGNATORY CARGO AIRLINES.													
Albame Express	32,210	29,859	27,505	34,013	24,573	31,036	35,058	77.72	38,500	28,504	34,220	31,588	372.677 C
Emery	39,780	38,188	47,167	82,547	60,343	48,885	40,022	49,431	42,431	48,455	35,489	35,853	569,641
Foderal Express	167,334	195,201	225 571	154.704	152,594	169,004	170,715	12,657	100,646	109,107	85,814	120,854	1,705,952
Foderal Express Feader	1,726	1,255	1,761	2,601	2,552	2,351	2,505	2,332	2,519	2,490	2,125	2,385	26,602
SAN	46,653	50,724	33,288	42,107	35,005	43,310	26,839	24,181	13,655	23,458	23,084	41,452	404,758
													8
CARGO TOTAL	287,703	375,226	253,243	315,977	275,157	252,585	275,137	235,815	197,751	213,014	184,742	22,2072	3,078,628
NON-SIGNATORY/JET A TOTAL	98,516	73,265	528,53	85,931	97,935	109,121	113,275	117,534	147,458	125,858	113,315	108.481	BU 703 766 F
NON-SIGNATORY/AV BAS TOTAL	2,389	1,381	2,247	2,445	2,564	2,970	3,492	3,344	3 323	3,651	2,256	2.463	32 626
FBO TOTALS	525,527	913,214	851,193	958,432	989,861	1,014,237	1,038,399	1,005,506	937,804	1,019,668	982,747	1,025,287	11,771,885
RESIDENT CORPORATE: Select Transport	7 850	c				c	\$	27.5	c	376.1		,	10
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MARAZ	15601	15,602	15,604	7,802	23,400	15,501	7,500	15,801	15,500	15,800	15,501	7,830	72,012
RESIDENT CORPORATE TOTAL	36,212	22,160	15,604	7,802	23,400	15,601	15,482	22,511	15,600	23,545	15,501	15,568	230,065
GRAND TOTAL	571,749	535,374	966,737	968,234	1,013,251	1,029,838	1,053,881	1,029,017	962,494	1,043,253	998,348	1,040,855	12,001,971
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Page 17 of 25 Document 115-2 Case 1:00-cv-00660-YK-JAS Filed 07/18/2007 110,850 651,828 277,777 1,393,482 1,393,482 1,994,438 226,777 1,091,755 288,511 10,947 1,031,755 288,511 10,947 10,217 10,217 1,404,663 520,118 261,217 1,345,173 30,865 459,776 13,255,139 13,255,139 2,617,149 54,438 163,439 202,158 420,035 VIZITION Aco Services 9,790 95,752 103,992 53,479 440 20,534 161,882 177,470 177,470 177,470 1,118,232 50,780 4,435 122,633 3,670 51,841 75,515 1,133 76,648 0 13,444 15,585 29,029 1,142,233 100,937 52,342 8,358 123,051 2,835 45,007 232,591 1, 550 1, 550 98, 937 41,296 7,759 17,954 15,673 1,139,522 7,844 0 0 0 68,069 110,695 112,00 178,024 178,03 21,03 21,03 21,03 21,03 31,19 34,03 3,652 1,030,954 37,557 3,950 114,625 2,955 47,098 286,385 7,788 25,226 15,546 48,558 6,035 0 0 7,4,298 4,2,576 1,52,058 1,52,058 1,7,287 1,7,287 1,7,287 2,000 2,000 2,000 1,9,673 2,000 2, 934,215 962,485 24,585 2224 96,306 2,225 28,959 2,553 2,553 86,814 0 12,570 15,400 28,270 August-OH AUgust 1,146,502 143,472 2,208 145,680 ,106,367 39,661 10,155 108,729 2,855 42,578 203,750 24,784 15,451 40,235 109-04 and Service 34,659 119,098 104,589 2,118 46,846 1,147,388 208,320 1,112,184 3,074 5,074 5,1813 0 19,792 15,402 35,194 102 Service 8 175 104, 334 104, 334 104, 334 104, 334 104, 334 104, 337, 611 80, 631 8 48,279 30,049 115,594 2,940 45,338 242,200 129,559 1,621 131,180 1,137,138 1,180,503 7,666 20,078 15,601 43,355 10,524 10,524 10,524 10,524 10,652 10,652 11,654 137,448 137,4 3,318 1,095,549 37,933 37,723 104,500 1,945 30,692 212,793 1,051,014 34,535 7,717 11,218 15,500 2011-04 April-04 April-04 April-04 April-04 April-04 April-06 Apri 37,309 25,904 108,160 2,651 22,333 1,034,387 2 506 128,553 197,355 0 18,063 23,367 41,450 12,050 12,050 12,050 12,050 137,050 137,050 155,725 155,725 155,725 155,725 155,725 155,725 155,725 155,725 155,725 156,725 15 47,973 39,204 114,575 2,860 34,124 2,257 2,257 139,658 1, 139, 327 1,170,542 238,736 7,813 0 23,402 31,215 February-04 10,889 10,889 10,889 10,349 11,4117 11,854 125,280 125,280 125,280 125,781 72,781 1,066,909 44,326 41,372 111,747 2,390 30,057 268'622 1,846 1,846 172,577 0 0 8 8 January-04
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Case 1:00-cv-00660-	GRAND A	108.214 C	Y 040,470 Y	612,485	689	282,423	6 6 0 0	346,523	Im 22,716,1	e	nt	430,787	1 290'	5-2	26,128	1,238,941	-ile	d §	07/	104,207	7/2	002157321	7	P /87	a (13,218,054	8 of 25
इस्टायल्स	GR2	ã	1,040	279	a	282	1 15	345	7,317	25.5	[°	430	1,881,067	PZ 915	, K	1,238		2,588	274	1,074	1,102	12,677	132,098	225,487	168,129	545,713	13,218	11,21
	December 05	7,800	91,295	765'E		38,038 154 ú51	45,778	4,621	107,788	isa'co	; a	39,020	685,415	28,927	0	130,583	B2,723	246,593	a	100	59,215	1,001,423	15,540	15,727	10 414	41,681	1,043,104	
	November-05 Agro Services	8,865	91,455 RF RT 7	42,351	0	127,716	52,348	7,377	127,163	400°E		35,513	683,480	57,572		4,675	78,411	245,232	a	57.75 201.7	\$1,584	1,030,296	7,609	15,654	12,939	35,402	1,055,598	
	October-05 Aero Services	10,048	84,659	72,091	0	130,631	27,374	64,821	130,633	25.407	a	14,743	752,458	51,550	٥	106,551	786,08	243,955	0	738,107	120,954	1,127,385	15,420	75,237	15,811	54,258	1,181,633	
	September-05 Aero Services	8,801	87,569	61,569	0	155.674	20,517	13,301	115,085	38.629		18,717	745,734	43,754	0	125,200	78,713	252,327	6	1,5/0	80,841	\$78,870,8	15,445	23,140	15.750	04,346	1,134,218	
	August-05 Aero Servicos	9,543	87,850	52,203	0	18,63	39,474	26,076	124,985	35 55		14,913	754,572	55. 538	0	120,754	60,589	239,714	Ö	2,878	113,201	1,117,487	¥69,7	15,403	19 063	42,756	1,159,663	
	July-D5 Aero Services	B,587	89,625	45,681		15,193	40,817	134,767	10,105	40.102		13,065	755,700	42,504	•	108,551	64,535	218,424	0	57,600	64,253	1,059,377	15,425	15,404	17,314	48,743	1,107,520	
	June-05 Aera Services	8,865	103 082	35,891	0	17.1028	47,767	19,175	131,449	35.075	. 0	23983	765,934	850.62	٥	109,749	55,844	207,541	Б	3 101	121,075	1,095,550	15,455	15,603	15,267	46,35\$	1,141,915	
	May-05 Aera Services	9,365	82,636	35,109	0 !	17.017	59,269	8,898	130,728	22.571		90804	745,675	42,601	o	3 705	54,954	185,584	8	2 510	85,084	1,020,443	18	23,068	16,094	44,004	1,067,447	
	April-05 Aera Services	8,967	78,863	40,984	0	18,063	22,747	7,371	120,760	24.197	o	69991	194,754	37,327		112,079	65,180	217,217	0	2513	76,446	988,527	7,845	15,480	14,755	36,000	1,025,607	
	March-OS Aero Services	9,125	89,919	75'65	٥	22,522	29,124	13,951	119,859	1.693		48,084	815,023	40,569	5,911	122,495	65,046	237,506		22,313	101,523	1,154,052	7,880	15,759	14,295	37,936	1,131,987	
	February-05 Aero Services	8,305	83,869	59,103	0 1	72,434	30,108	17,005	101,556	3 0	, 0	48,193	721,006	42,099	5,558	58,337	27,598	175,285	0	1 734	80,458	977,750	7,837	23,478	23,225	54,58T	1,032,341	
	January-05 Aero Sarvices	7,492	88,869 87,878	62,572	668	21,621	43,142	31,152	94,078	6 926	0	46,081	725,338	48,529	14,549	113,783	37,425	217,285	7.7.7	(8, 14) 7‡ 1	77,586	1,020,209	7,843	82323	13 360	4,732	1,084,941	
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HWRISBIND INTERNATIONAL ARPORT	SIGNATORY PASSENGER AIRLINES:	cr.	Engla	fines	;; ;sq. **	al Aidhes d Aidhes	saus	£	7053	, S	į		PAS.	SIGNATORY CARGO AIRLINES: Atdome Express		Federal Express				MON-SIGNATORY/AUGAS TOTAL	NON-SIG		RESIDENT CORPORATE: Soled Transport			KESIDENI CO		生物 法法法律 医医心性 化苯酚二甲基酚二甲基酚二甲基酚二甲基酚二甲基酚
HARRIEN	SIGNATOR	Ar Georgian	American Engla	Comali Airfines	Commutab	Continental Attines	United Airfines	US ALvays	USA's Express	Ar Wisconsin	Air Jazz	羟		SIGNATORY CA	Emety	Federal Express	S S		AIR BP	NOW NOW NOW	}		RESIDENT COR	RIBAM	Hershey Foods			and the section

HARRISBURG INTERNATIONAL AIRPORT

GALLONS BY MONTH 2005													
	January-09	February-08	March-05	April-05	ney-08	SO-eun	50-fur	August-08	September (36	October-05	November-05	December 08	GHAND
SIGNATORY PASSENGER AIRLINES:	Anth Services	Aem Senices	Aero Services	Aero Services	Aem Services	Aero Services	Aero Servicas	Avischi Svice Indi	Avison Svcs mil	Avfight Svrs. Intl.	Avflight Svcs, trill	Auticht Svcs Infi	TOTALS
Air Georgian	1,997	8,143	8,190	8,635	9,508	8,781	9,330	8,870	700	6,943	ä.	6,785	103,120
American Eagle	805,98	85,057	52,631	88,058	87,430	82,918	84,005	91,683	117,817	132,290	127,591	133,179	1,209,637
Atlanta Southeast	88,244	88,719	38,45D	102,267	25,035	90,559	90,297	123,885	65.977	77,516	64,857	71,761	1,048,637
Masa	o	21,012	41,776	62,311	37,328	727,02	28,938	30,376	27,003	35,814	53,196	81,065	478,595
Compit Airlines	27,740	27,183	27,690	25.270	24,485	25,723	23,453	27,52	50,485	81,230	5,273	59,254	443,536
Contrarnal Africas	27,129	27,130	29,142	28,213	24,451	720,027	24,222	26,070	20,593	24,437	22,853	22,070	298,352
North West Alfines	99,950	65,511	85,712	57,455	75,357	83,905	124,993	131,255	113,133	110,025	95,331	122,824	1 195 591
United Astrnes	46.744	45,200	41,551	17,697	40,205	21,316	54,814	46,358	50,871	45,583	41,916	48,575	548,161
US Always	7,250	7,962	8,672	10,553	3,639	4,806	10,455	4,458	3,490	4,833	719	14,185	51,121
USAr Expres	109,976	100,954	105,863	100,054	110,008	117,110	106,502	114,220	110,483	113,348	\$09,60\$	115,618	1,313,769
Water Flue	51,317	11,355		0	0	16,004	152,231	872,15	285,282	78,375	D	0	273,251
Air Wisconsth	o	0	•	0	0	0		0	0	0	0	c	0
TSA	57,550	72,245	71,999	49229	72244	68338	65,891	71,522	32,815	27,929	129 89	72,658	120,00
PASSENGER TOTAL	619,315	580,539	611,486	576,808	570,788	589,763	644,942	583,583	657,498	721,239	679,514	749,076	7,725,082
SIGNATORY PARED AIDS NASS								***************************************					
Actualis Express	49,552	49,045	72,07	45,278	57,825	57,12	44,725	33,478	34,848	38,518	33,247	26,767	544,085
Federal Express	115,122	114,016	132,902	115,333	124,275	111,909	107,093	132,459	89,593	115,035	117,567	137,625	1,412,240
Foderal Express Feeder	4,855	4,140	5 27	2,857	3,397	2,884	2,105	2,501	2,521	2,928	2,685	3,134	39,150
UPS	55,180	73,271	124,070	122,23	103,262	117,843	75,603	88,631	69,724	95,673	1283,57	26.878	1,037,439
CARGO TOTAL	224,909	240,472	331,224	248,719	238,761	792,297	728,827	255,079	194,866	252,354	227,482	244,604	3,631,924
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100	3	>	>	3	3	,	••••						0
NON-SIGNATORY/JET A TOTAL	93,549	62,391	84,055	70,550	70,834	105,167	L/2,001	120,856	102,359	102,673	103, 132	72,238	1 099 224
NON-SIGNATORY/AV GAS TOTAL	1 502	1,478	1991	1,897	1,542	2,055	2,571	1.854	2,152	2,298	2.733	1991	23 400
NON-SIGNATORY TOTAL	101,051	63,867	85,047	72,447	72,676	107,222	102,544	122,740	164,551	104,975	110,865	75,238	1,122,624
FBD TOTALS	945,275	884,937	1,022,757	897,974	\$32.225	990,892	977,413	1,071,814	986,935	1,078,628	1,017,861	1,068,919	11,879,530
RESIDENT CORPORATE:													
Select Transport	7,754	0	15,582	C)	23,414	7,794	7,718	7,689	0	7,795	7,815	7,824	53,483
Richid	15651	23,502	15,558	15,631	211,112	23,153	15,440	15,417	23,244	23,374	15,638	7,853	217,893
Hershay Foods	14,656	17,273	16,024	17,117	16,363	20,538	10,583	18,532	13,598	19 511	17,371	10,715	190,004
RESIDENT CORPORATE TOTAL	37,501	40,875	47,264	32,748	63,115	51,485	33,845	35,728	38,942	50,550	40,624	26,382	501,410
GRAND TOTAL	982 778	925.812	1.076.021	930,722	035.340	1.042.378	1.011.258	1 111 552	1.023.877	1.129.308	202 50 5	1 093 144	040 481 64
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Exhibit "E"

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Damages

Stambaugh Air Service vs Susquehanna Area Regional Airport Authority

Background

Basis. Stambaugh Air Service Inc occupied hangar space at Harrisburg International Airport from 1973 through 2003. The business occupied Building 28, which was hangar space and shop and office space. It also occupied Hangar 133 and Hangar 134.

Between 1973 and 1988 the business of the company was primarily focused on military contracts. The principle contracts were with the Navy and were composed of "Standard Depot Level Maintenance" on various aircraft models in the Naval Aviation training fleets.

In 1988 the company shifted its focus to repair and maintenance of civil commercial aircraft, and by 1990 the company was uniformly in the civil aviation business

The internal structure of the company depended upon leadmen, each of whom had an assigned crew. While the majority of the crews were assigned to metal work, fuselage and flight surface repairs, there were a number of leadmen and crews assigned to a flexible schedule that allowed them to provide ground handling and ground services to based and transient customers.

This section of the company provided all Fixed Base Operator (FBO) services described in the FAA Circulars with the exception of flight instruction and air charter. The company provided hangar space, tie down, fuel, oil, maintenance, and aircraft sales

The nature of the aviation market at Harrisburg International Airport militated against the existence of a "full time" FBO Transient flights, transient fuel sales and ramp parking were sporadic. The majority of the scheduled carriers provided their own fuel, limiting the FBO involvement to upload, ground handling and maintenance. Some cargo carriers also provided their own fuel. So for cargo, ground handling as well as cargo management services were made available.

Over the course of two decades, the services provided by Stambaugh changed because the passenger and cargo flights changed Some carriers increased their flights and began to provide their own ground service During the same time period, some carrier flights

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decreased and the Stambaugh services were necessary but diminished. However, the common element that Stambaugh provided on the field was "on call" maintenance. Stambaugh, until the day that it left HIA, was the sole source for the on call maintenance provided by licensed mechanics that is required by scheduled air carriers in order to comply with FAA requirements. No FBO serving HIA after Stambaugh, had the qualified and licensed personnel to provide on call maintenance to the heavy jets that composed the majority of the flights into and out of HIA.

In the third term of the Stambaugh Lease, the airport asked Stambaugh to provide a dedicated FBO office. That office was created in Building 134 because it was the only leasehold space adaptable for an FBO office. Stambaugh then initiated a series or requests for locations on the airport on which to build or purchase an FBO office. It requested construction areas located west of Building 134. This request was denied by SARAA. It attempted to purchase the AMP hangar. However, SARAA refused to extend the ground lease and ultimately purchased that hangar itself. Finally, it requested controlled ramp access to FBO Customers utilizing the FBO facility in Building 134. This also was denied.

Damages

The question before the Court will be how was the business of Stambaugh damaged by SARAA's termination of its FBO authority and its failure to allow the company to continue business at HIA

The description of this damage must be viewed in a "cascade analysis"

First the denial of the continuation of FBO rights had two effects First, the company lost the gross income from that service and second, the company was denied a location that would have survived the terminal expansion. That relocation, on the airport would have allowed the company to continue its FBO services into the future and the argument is that the company's structure was the sole corporate profile that could have made money at HIA

Relating to the description of the corporate structure contained above in "Background," Stambaugh was the only tenant at the airport which did not have to have personnel solely

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dedicated to FBO services. The FBO service and the heavy aircraft services were married in that the company management cross trained employees to perform both FBO and Maintenance services and, thereby, there was no lost productivity when there were no flights in HIA to be serviced by the FBO

So fueling revenue was lost, and a permanent location at HIA was lost through the leasing of that location to another company When SARAA made that decision, the cascade of damages began

The loss of the revenue from fuel denied the company any fall back financial strength when the September 11, 2001 attacks affected aviation. That post 9/11 downturn forced the company to seek bankruptcy protection in June 2002. With the planned Airport expansion SARAA then terminated the company's ability to remain on the airport. In 2003 the company then incurred costs to move its operations to Georgia, because Stambaugh's was denied the AMP lease or purchase and had no other location on the airport.

On a secondary level, Stambaugh also lost the support and ground power work for the FBO customers. This work, which was composed of ground power, ground equipment and certain aviation repairs represented 10% to 12% of the company gross. The ground power shop occupied approximately 14,000 square feet of Building 28 and had licenses as a Pennsylvania Inspection Station.

- I Income from fuel sales was composed of two components. One was the "upload" fee charged to carriers which stocked their own fuel at HIA. The second was a true sale at retail. The labor component for the cost of sales for the fueling operation was integrated with the labor cost for the entire company.
- 2 Lost revenue has been extrapolated from the fuel figures supplied on the 27th of June, 2007 Those figures are expressed on the attached sheet
- 3 The Gross Revenue Cost of Sales and Gross Profit is expressed on the attached sheet. The lost of Fuel Revenue only incrementally affected the Gross Profit because the labor was retained for other projects and the adjustments to Cost of Sales were a diminution in internal Ground Power costs plus Fuel Farm rental.
- 4 The difference in the gross sales for 2000 and 2001 and 2002 was a the termination of the right to sell fuel and b the impact of 9/11 The average

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- 5 difference in gross revenue is 1 09 million over the length of the normal lease plus extensions. This is the calculation of the lost revenue as well as the lost opportunity at HIA over a straight line reflecting the flat market trends at HIA 1 09 million X 5 years = 5 45 million in lost revenue on sales of fuel over original and two 5 year extensions (5 45 x 3 = \$16,350,000) \$16,350,000
- 6 In addition to the lost fuel sale revenue, the following costs were incurred in the termination of fuel sales.

a. Cost of rehabbing fuel farm		
within 6 months of termination of rights	\$	28,000
b. Cost of transferring fuel trucks to GA	S	45,297
c. Cost of transferring Surface tanks	\$	3,182
d. Cost of scrapping fuel and ground handling		
Equipment (replacement cost minus salvage)	\$	143,000
e.Labor for Packing and Shipping (2000 ht)	\$	40,000

7 Loss of secondary maintenance work associated

with lost fuel services 12%

Ground Power and aircraft: \$962,000

a.	\$962,000 X 5 (Lease Term) =	\$ 4,810,000
b.	Lease Extension of 10 years (2 term)	
($$4.810.000 \times 2 = $9.620.000$	\$ 9,200,000

The refusal to allow a lease of the AMP building or other Space at the airport on which to operate caused the Company to move its operations to Georgia facilities

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a.	Cost of managers lodgings for one year. (\$875 x	
]	2 = \$10,200)	\$ 10,500
b.	Per Diems and travel for relocated employees.	\$ 141,463
C.	Employee apartments (\$2,956 x $12 = $35,481$	\$ 35,481
	Furniture rental for relocation	\$ 5,621

Costs incurred in the filing of Bankruptcy

\mathbf{a}_{s}	Trustees Fees	\$ 30,250
b.	Professional Fees	\$ 53,386
c.	Administrative Fees	\$ 35,285

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10 Costs incurred in the negotiations with SARAA for FBO and Building rights \$ 14,990

Total Damages: \$30,946,455